

August 11, 2025

Hon. Valerie Figueredo
Daniel Patrick Moynihan U.S. Courthouse Southern District New York
500 Pearl St.
New York, NY 10007

Case: Goolden v. Wardak, No. 1:19-cv-06257 (ALC) (VF)

Dear Judge Figueredo,

I respectfully write in opposition to Ms. Goldberg's August 11, 2025 request that the Court appoint a "neutral" to conduct the ex parte conference regarding her motion to withdraw.

There is no basis for appointing a neutral. I am confident that Your Honor can hear and decide this matter without any risk of prejudice. The information to be discussed does not jeopardize the merits of my claims, and I trust that Your Honor will not be swayed in any way by privileged or sensitive attorney-client information. Additionally, we already had a meeting regarding her motion to withdraw, during which Ms. Goldberg had every opportunity to raise her concerns about this process and her reasons to seek withdrawal.

It is my understanding that District Court Judge Carter would preside over a trial not your Honor; any suggestion that your involvement would compromise the fairness of the trial is unfounded.

This Scheduling order for this meeting was issued on July 22 and counsel has had weeks to make this request, instead she is seeking this just two days before the scheduled conference. Assigning a neutral at this stage would create needless delay and added complexity, compounding the prejudice I already face without representation. The Court has already scheduled this conference, and it should proceed without further postponement.

This motion has been pending for months. The prolonged uncertainty over counsel has already caused substantial prejudice to me, and the more time that passes, the greater that prejudice becomes.

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For these reasons, I respectfully request that the Court deny Ms. Goldberg's request for a neutral and proceed as planned.

Respectfully submitted,

Sarah Goolden
/s/ Sarah Goolden

A handwritten signature in black ink that reads "Sarah Goolden". The signature is written in a cursive style with a large, stylized "S" and "G".

Sarah Goolden
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